

CHAPTER 4 - SMALL COMMUNITY NEEDS DATA COLLECTION

BACKGROUND

In the 1992 Needs Survey and the 1996 Clean Water Needs Survey (CWNS), EPA and the States made a special effort to obtain a better representation of the needs of small communities. The Small Community Team of the CWNS Workgroup was originally formed to define "small" and to develop criteria for "alternative documentation" that would provide for national consistency. For the CWNS 2000, the Team—which included State Coordinators from Colorado, Kentucky, North Carolina and Texas; EPA Regional Coordinators from Regions 3, 4, 5, and 7; and EPA Headquarters staff—reviewed existing alternative documentation criteria and determined procedures for the use of alternative documentation types as a means of redocumenting needs.

When submitting small community needs documentation during the CWNS 2000, ***States should send copies of documentation to their Regional Coordinator and to the contractor.***

DEFINITION AND CRITERIA

An EPA definition of 10,000 (current population) for small community was used in the 1992 Needs Survey. As with the 1996 Needs Survey, the committee believes that using that definition provides insufficient information on the needs of smaller communities. Therefore, three current population levels will continue to be used to define small communities: population that are less than 1,000; populations between 1,000 and 3,500; and populations of more than 3,500.

Many small communities' needs are underestimated since acceptable documentation is unavailable. Although small communities will be identified through a computerized selection process according to population and flow, it is important to recognize the potential for error and to give the States the option to modify the "list" of facilities designated as small communities. A small community is defined as a community having a population of less than 10,000 and a flow of less than 1 MGD. If a State has a facility meeting these criteria but does not classify the community as small, the State may designate the facility as an exception by checking the small community exception flag associated with the population data in the CWNS database.

A considerable amount of judgment might be required to distinguish a facility serving a small community from an extension of a larger community. Note that a facility ***should not*** be designated a small community if

- It is only one of several facilities serving a community of 10,000 people or more.

- It has a wastewater system and its location within an urbanized area makes it an end component of, and virtually indistinguishable from, surrounding or adjacent entities.
- Its wastewater system is physically connected to a regional treatment authority serving 10,000 people or more.

NOTE: If a small community is physically connected to a larger system but is still financially responsible for its own infrastructure needs and repairs (such as collection system needs), the community may still be considered small for the purposes of the CWNS 2000.

ALTERNATIVE DOCUMENTATION REQUIREMENTS

Four requirements must be followed when using the criteria:

1. Alternative documentation will be accepted **only** for communities with populations of less than 3,500.
2. Alternative documentation can be used only if acceptable documentation types 1 through 27 (listed in Table 3-3) are not available.
3. To satisfy a need, documentation must include a statement of why the project is necessary (water quality or public health problem), what the project includes, and what the benefits will be.
4. Alternative documentation must be submitted to the Regional Coordinator **in addition to** the contractor (as described in the next section under "procedures").

Documentation Types (Codes 28–31)

The following paragraphs describe each of the alternative documentation types and include comments concerning the proper use of the documentation types.

Note: These documentation types are applicable only to communities with populations of less than 3,500.

Funding Applications (28)

All applications for funding are acceptable for documenting need. The application is acceptable for cost if the engineering report has been reviewed by qualified state project staff.

State Needs Surveys (29)

All State Need Surveys are acceptable **for documenting need** if they include:

- A local government official's signature. ("Local" means city, community, town, borough, village, or county.)
- Information describing the problem (attach).

State Needs Surveys are acceptable **for documenting cost** if a cost estimate that has been prepared and signed by an engineer or engineer

circuit rider is attached. The cost estimate need not be as detailed as that found in a facility plan, but it must include the engineer's rationale for the estimate. Qualified state project staff must also sign a statement of cost reasonableness after reviewing the estimate.

Model Survey Form (30)

Use of a completed (and signed) standard model survey form is acceptable for documenting need and cost. If costs are not included, improved cost curves will be used. A copy of the model survey form is provided at the end of this chapter. *NOTE: When using this form, supplemental information must be attached to document the need.*

Information from an Assistance Provider (31)

A statement of need from a technical assistance provider (State training center, health department, circuit rider, etc.) with a soils/geologic report, health department report, or similar document would document need. The signature of a local official and the provider must be included. Cost curves will be used to document costs. *NOTE: For purposes of documenting need, the term "circuit rider" refers to a designated regional planning agency, engineer, or other agent approved by the Region/Headquarters. For purposes of documenting costs, an engineer "circuit rider" refers to an engineer. "Qualified state project staff" refers to individuals who are responsible for reviewing engineering documents. These individuals are knowledgeable about the national estimates of costs for types of wastewater facilities and the specific conditions that may influence costs within a state.*

USE OF ALTERNATIVE DOCUMENTATION

Guidelines

- A State should not fill in blanks on survey forms; if there are blanks, the State should contact the community for the missing information.
- If a State CWNS Coordinator does not agree with a community's cost estimate, he/she should contact the community for clarification. If the disagreement is not resolved, the State Coordinator may choose to include the needs in the Separate State Estimates.
- States should not use State cost curves or economic analyses to justify costs. Instead, they should supply information to the contractor for use in improving the national cost curves.

Suggestions

If a State already has a state survey form, it should try to retain its current survey form and add questions to it that allow users to follow the criteria. If a State has questions about whether its survey form meets the alternative documentation criteria, the State should ask the Regional CWNS Coordinator.

Procedures

- Documentation codes 28 through 31 must be used if the alternative documentation criteria are used. In addition, States should use the comment screen to further define the alternative documentation.
- States need to send the needs package and appropriate documentation with attachments, with the exception of needs packages for documentation types #29 and #30, **to the Regional CWNS Coordinator for review.** When the state or model surveys are used, the Regional CWNS Coordinator will randomly select at least 5 of the survey forms and (documentation) for review. If the 5 forms selected do not meet the criteria, the Regional CWNS) Coordinator will discuss the criteria with the State CWNS Coordinator and review additional survey forms as needed.
- The Regional CWNS Coordinator will verify that the criteria have been followed and will forward the package to EPA headquarters. (Regional review is intended to be for screening purposes only; States are required to know the criteria.) The States will receive a copy of the transmittal letter indicating the acceptance of the package. Regional CWNS Coordinators will contact the States regarding incomplete submittals.
- Although the Regional CWNS Coordinators will review the alternative small community documentation, all documentation is subject to EPA headquarters' review. Site visits are a possibility.
- The Small Community Team may be contacted if there are questions on the use of the criteria.

Redocumentation

The workgroup recognized that it might be harder to redocument smaller community (populations of less than 3,500) needs. Therefore, you can use the model survey form to help redocument needs for communities with a population of less than 3,500.

Redocumentation Criteria

Facilities with total needs greater than \$20 million (year 2000 dollar base) and documentation dated prior to January 1, 1994 and **all** facilities with needs and documentation dated prior to January 1, 1990 regardless of the dollar amount of needs.

Using the old documentation, the State will follow up with the community and assist in the redocumentation of the need and cost. The State will document follow-up as part of the redocumentation. A copy of the phone log and/or letter sent to the community should be retained to send to EPA headquarters. The model survey form will be sent to the community for signature. If the community is unwilling to sign but the State can document that a need still exists, the State may write an explanation for maintaining the need and cost, and the reason that the community would not sign. If the model survey form is used to only document need, then use the cost curves to estimate a cost. **NOTE: Only a state engineer or other qualified state project staff can redocument cost. This redocumented need would be subject to EPA headquarters or designated State(s) for approval.**

Model Form for Small Community Clean Water Needs Survey

CLEAN WATER NEEDS SURVEY

Small Community (population <3,500) Need

The following information is being requested to complete the Clean Water Needs Survey 2000 Report to Congress.

This information will help to better represent the needs of smaller communities.

(Please Print or Type)

Community _____

Mailing Address _____

Form Completed by _____ Date _____

Title _____

Telephone Number _____

Population and Year of Source _____

To what extent is your community served by a publicly owned sewer system?: _____

Needs (Description/Reason/Estimate/Documentation):

Description: Please describe any of the following needs (include appropriate information, with units, such as length of sewer, capacity of pump, etc):

Wastewater Treatment (including sludge handling/disposal)
Infiltration/Inflow Correction
Replacement/Rehabilitation of Sewers
New Collector/Interceptor Sewers
Nonpoint Source Pollution Control
Ground Water Protection
Other

Reason: Please note the reason for the need:

Public health problem____ Water quality problem____

Details:

What will be the benefit of this project?

Cost Information (Please provide costs for each of the needs listed above. If no cost information is available, please note.)

Need:	Cost:
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Supplemental Information: Please attach information to document need. For example, for unsewered communities, any of the following types of information could be submitted (the more the better): signed statement from the health department on health hazards and/or documentation of septic tank failure, water quality problem, and/or violations of safe drinking water standards. Include date and source of information in the space below.

Need: As local official, I hereby certify that the community has the clean water needs described on this form.

Name: _____ Date _____

Title: _____

Signature: _____

Please have an engineer or engineer circuit rider sign below.

Cost: I hereby certify to the best of my knowledge that the cost of the community's clean water needs (as described on this form) are accurate.

Name: _____ Date _____

Signature: _____

Title: _____

(Note to State: If the second signature is not complete, cost curves will be used.)

Qualified State Project Staff (Signature): _____ Date: _____

CWNS Survey Coordinator (Signature): _____ Date: _____

(if different from above)